

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

KATHERINE JARVIS,

Case No: 2:21-cv-10381

Plaintiff

v.

Hon. Bernard A Friedman

OAKLAND-MACOMB OBSTETRICS AND
GYNECOLOGY, P.C. AND

Mag. Judge Elizabeth A

JOHN MICALLEF,

Defendants.

Katherine G. Jarvis

8130 Ivy Glen Park Lane

White Lake, Michigan 48386

katherinejarvis@gmail.com

MOTION TO DISMISS AND WITHDRAW:

THE STIPULATED CONFIDENTIALITY PROTECTIVE ORDER.

Whereas Plaintiff Katherine Jarvis has not agreed to be a party to or has given any consent to Shinn Legal and/or Jackson Lewis P.C., for the Stipulated Confidentiality Protective Order, signed on August 25th, 2021, and filed in this court on August 27th, 2021.

Katherine Jarvis does not agree with any part of the Stipulated Confidentiality Protective Order and any part therein and hereby files this motion to withdraw for any agreement to protect the defendant from disclosing any information, if the defendants want an order of protection, then they must follow proper procedure in securing an order of protection from this court as in a traditional manner, as defined in the Federal Rules of Civil Procedure.

Memorandum of Points and Authorities.

1. Before making any decision, Jason Shinn, Plaintiff's attorney, was given instructions to confer with Katherine Jarvis, Plaintiff, before signing any documents.
2. Jason Shinn never consulted with Katherine Jarvis before signing the Stipulated Confidentiality Protective Order.
3. The Stipulated Confidentiality Protective Order only protects the defendants from their wrongdoing.
4. The Stipulated Confidentiality Protective Order is only for the benefit of the defendants.
5. Jason Shinn neglected to inform and/or disclose the agreement to Katherine Jarvis and did not before or after agreeing to the Stipulated Confidentiality Protective Order.

6. Jason Shinn neglected to read the Stipulated Confidentiality Protective Order before he signed.
7. If the defendants wish to request the court for an order of protection from any disclosure, they may do so in a traditional manner as set forth in the Federal Rules of Civil Procedure.
8. Katherine Jarvis Reserves the Right to seek a protective order on a per-document basis.
9. Katherine Jarvis has formally requested Jason Shinn verbally by phone on September 15th, 2021, and by email on September 15, 16, and 20th, 2021, and Mr. Shinn has flat out refused to respect and comply with my request to withdraw from the Stipulated Confidentiality Protective Order, without citing any legal authority when refusing to do so.
10. Jason Shinn has not even attempted to offer to redraft the Stipulated Confidentiality Protective Order.
11. The Stipulated Confidentiality Protective Order is an agreement between the Attorney's not to disclose any material either of the Attorneys feel is confidential, private, and or embarrassing, and removes this courts discretion, allowing the defendant not to disclose anything that needs to be disclosed to prove the wrongdoing on the defendants part.

12. Jason Shinn never informed and/or provided Katherine Jarvis that he had consented to the Stipulated Confidentiality Protective Order, Katherine Jarvis found out by checking the court docket on Pacer, while checking to see the progress of the case.

13. The Stipulated Confidentiality Protective Order repeatedly states documents are covered by for “For Attorneys Eyes Only,” any document can be stamped “Confidential” and “Attorneys Possession Only.”

14. This order of protection is a violation of Katherine Jarvis’s first amendment right of the United States Constitution.

Katherine Jarvis hereby respectfully requests this court to withdraw my consent to the Stipulated Confidentiality Protective Order.

Respectfully Submitted by:

/s/ Katherine G. Jarvis

Katherine G. Jarvis

8103 Ivy Glen Park Lane

White Lake, Mi 48386

(248)931-7477

katherinejarvis@gmail.com

Plaintiff

CERTIFICATE OF SERVICE:

I, Katherine G. Jarvis, do hereby certify that a copy of the foregoing has been disclosed and served on all parties at interest.

This Court

Address: 211 West Fort Street

Detroit, Michigan 48226

(313) 234-0065

The Clerk of the This Court:

Address:

SHINN LEGAL, PLC

Jason M. Shinn (P64453)

Attorney for Plaintiff

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JACKSON LEWIS P.C.

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Katherine G. Jarvis

/s/ Katherine G. Jarvis
